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after judgment would prevent an appeal from a Circuit to the Supreme Court. *Alabama Gold Life Ins. Co. v. Nichols*, 109 U. S. 232; *Pacific Postal Tel. Cable Co. v. O'Connor*, 128 U. S. 394. When, as in the principal case, there is a reduction of the *ad damnum* clause to prevent removal to the federal court, the same underlying principle governs. The reduction, if it takes place after removal, will, of course, be ineffectual to deprive the federal court of jurisdiction already acquired. *Johnson v. Computing Scale Co.*, 139 Fed. 339. The same is true if the petition and bond for removal have already been filed. *Chicago, R. I. & P. R. Co. v. Stone*, 70 Kan. 708, 79 Pac. 655. But a reduction made prior to the filing of the petition for removal is effective to prevent the federal court from getting jurisdiction. *Western Union Tel. Co. v. Campbell*, 41 Tex. Civ. App. 204, 91 S. W. 312.

FOREIGN CORPORATIONS — DOMESTIC JURISDICTION — JURISDICTION OF EQUITY TO INTERFERE WITH INTERNAL MANAGEMENT OF FOREIGN CORPORATION. — A foreign mutual beneficiary society threatened to cancel the plaintiff's certificate entitling him to membership and insurance. Having served process on the local agent, the plaintiff asks an injunction to prevent this action by the corporation. *Held*, that the relief cannot be granted. *Tolbert v. Modern Woodmen of America*, 145 Pac. 183 (Wash.).

For a discussion of the jurisdiction of equity over the internal management of foreign corporations, see p. 611 of this issue of the REVIEW.

INJUNCTIONS — ACTS RESTRAINED — PAYMENT OF SALARIES ALLEGED NOT TO BE CONSTITUTIONALLY AUTHORIZED. — A state legislature created an investigating commission and provided for the payment of the salaries and expenses of its members. The plaintiff, a taxpayer, alleging that this legislative action was unconstitutional, brings suit to enjoin the state auditor and treasurer from making the authorized payments. *Held*, that he cannot maintain the suit. *Sutton v. Buie*, 66 So. 956 (La.).

The court, while admitting that these taxpayer's actions are maintainable against municipal officers, properly distinguishes attempts to enjoin state officials by reason of the practical inconvenience involved, and avoids the common error of denying relief upon jurisdictional grounds, or upon the theory that the suit is really brought against the state itself. For a discussion of the principles involved, see 28 HARV. L. REV. 309.

INTERSTATE AND FOREIGN COMMERCE — WHAT CONSTITUTES FOREIGN COMMERCE — ROUTE OVER HIGH SEAS WITH *TERMINI* WITHIN ONE STATE. — A California corporation operated a line of steamships running from one port in California to another port in the same state, part of the voyage being on the high seas. The state Railroad Commission undertook to regulate the rates charged. *Held*, that the state commission has this power. *Wilmington Transportation Co. v. Railroad Commission of California*, 236 U. S. 151.

This case, one of first impression in the United States Supreme Court, affirms the decision of the state supreme court discussed in 27 HARV. L. REV. 686. See *Wilmington Transportation Co. v. Railroad Commission of California*, 166 Cal. 741, 137 Pac. 1153. The only other adjudication is now overruled. *Pacific Coast S. S. Co. v. Board of R. Commissioners*, 18 Fed. 10. The case does not, however, involve a decision that rates for such commerce are exclusively within the control of the states. The court reaches its result on the narrower ground that the matter is one of purely local concern, and therefore within the control of the states, at least until Congress has acted. See *Port Richmond, etc. Co. v. Board of Chosen Freeholders*, 234 U. S. 317. Whether or not such commerce may be brought within federal jurisdiction under the commerce clause remains as yet undecided. The carriage of goods from a point on the high seas without the United States to a point within, although not strictly com-